

FILED
Clerk
District Court

NOV 10 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

Robert D. Bradshaw
PO Box 473
1530 W. Trout Creek Road
Calder, Idaho 83808
Phone 208-245-1691

Plaintiff, Pro Se

**IN THE UNITED STATES DISTRICT COURT
FOR THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

ROBERT D. BRADSHAW

) Civil Action No. 05-0027

Plaintiff

v.

COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS (hereafter referred to
as the CNMI);
et. al.

Defendants

) MOTION TO CLERK OF COURT
) TO ENTER A DEFAULT
) JUDGMENT AGAINST
) DEFENDANT ROBERT A. BISOM
)

TO THE CLERK OF THE US DISTRICT COURT FOR THE COMMONWEALTH OF THE
NORTHERN MARIANA ISLANDS

1. Comes plaintiff ROBERT D. BRADSHAW in Civil Case 05-0027 to petition the court to enter a default judgment against Defendant ROBERT A. BISOM for the amount as claimed in the amended complaint, plus costs because defendant BISOM has failed to appear and to respond to the summons served on him.
2. The rules of the court are plain and unambiguous regarding service and the duty of those served to respond to a summons. Defendant BISOM and his attorney Jay H. Sorensen are lawyers and should understand this matter.
3. On the BISOM complaint and summons, default commenced on Nov 1, 2005

when Defendant BISOM failed to appear and answer the summons served on him.

4. Plaintiff's Affidavit on default includes bill of costs for cases 05-0027 as well as the preceding costs on CNMI case 96-1320 and USDC ID case 05-0084. Actual damages are \$147,230.00 (including costs from 96-1320 and 05-0084), punitive damages are \$750,000.00, and costs for 05-0027 are \$2220.00--all of which total to \$899,450.00.

5. As this case involves a failure to appear with a sum which can be calculated as certain, as defined in rule 55 of the Federal Rules of Civil Process, request that the Clerk of the US District Court for the Commonwealth of the Northern Mariana Islands enter a default judgment against Defendant ROBERT A. BISOM.



Robert D. Bradshaw, Plaintiff, Pro Se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of Nov 2005, I caused to be served a true copy of the foregoing document by US Mail Postage Paid to each of the following:

Jay H. Sorensen, c/o Shanghai, PO Box 9022, Warren, MI 48090-9022
The Attorney General, 2d Floor of the Juan A. Sablan Memorial Bldg,
Caller Box 10007, Capitol Hill, Saipan, MP 96950.



Robert D. Bradshaw, Plaintiff, Pro Se